

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL NINE)

Docket No. RM2015-2

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO QUESTION 1 OF CHAIRMAN'S INFORMATION REQUEST NO. 5**
(April 27, 2016)

The United States Postal Service hereby provides its response to Question 1 of Chairman's Information Request No. 5, issued April 18, 2016. The questions are stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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April 27, 2016

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1. The 1999 Data Quality Study,¹ at 44, discussed the possibility of using Time and Attendance Collection System (TACS) data instead of In-Office Cost System (IOCS) data to split in-office and street costs for city carriers, stating:

Rate making staff should work with Operations staff to ensure the quality of the electronically recorded time clock data is sufficiently complete and accurate for use in rate making. The Study team acknowledges that the Postal Service has concerns over the accuracy of these data due to conflicting performance measurement issues. The supervisors are measured by the amount of time the city carriers spend in-office versus on the street. Therefore, there are incentives for the supervisors to inaccurately report these data. The varied uses of these data should be taken into account in designing the data collection and quality control process. Potentially the right to influence the data collection process should be removed from the supervisors.

Please identify the changes in TACS since 1999 that have increased the reliability of the data and removed the conflicting performance measurement issues.

RESPONSE:

Technological advancements since 1999 have removed the conflicting performance issues cited in the Data Quality Study Summary Report. The National Workhour Reporting System (NWRS) reports work hours by Labor Distribution Code (LDC). The recommendation at the top of the paragraph cited by the Commission stated: *“Consider the use of electronically recorded time clock data as a replacement for the IOCS data used to split in-office and street costs for city carriers.”*²³ The

¹ Data Quality Study Summary Report, April 16, 1999.

² *Id.* at 44.

³ IOCS – In Office Cost System

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reference to the report does not specifically mention the Time & Attendance Collection System (TACS) because at the time NWRS was gathering data from multiple electronic time clock systems. In 1999, the Postal Service was transitioning to a uniform system for recording city carrier clock rings. However, there were still at least three data systems recording city carrier activities. One system, the Postal Source Data System (PSDS), required the supervisor to enter carrier clock rings manually each day to capture the LDC information that was needed to determine the proportion of time carriers spend in office and street activities.⁴ Eventually, PSDS and ETC were phased out and TACS became, as it is currently, the uniform system for capturing city carrier activities. TACS currently captures the time and corresponding operation number of each city carrier clock ring, and that information is directly fed into NWRS. Any manual adjustment to clock rings by management is flagged and thus can easily be audited. NWRS then aggregates the TACS data by LDC, which can be used to determine the proportion of carrier time spent in office and street activities.

A critical benefit of having TACS as the uniform data system to record city carrier activities is that management was able to institute specific procedures for the carriers to conduct their clock rings. The standardization of the process for capturing city carrier activities has led to TACS providing accurate proportions of city carrier office and street activities.

⁴ Two other systems besides PSDS were the Electronic Time Clock (ETC) and TACS.

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In sum, there are three reasons why electronic recorded time clock data can now be reliably used, as a substitute for IOCS, to establish the office and street split for city carrier activities. One, TACS becoming the uniform system to record city carrier clock rings resulted in management developing procedures that ensure that carriers are measuring their office and street activities in a consistent and reliable fashion. Two, TACS information is automatically captured by NWRS, which obviates the need for daily manual entries by carrier supervisors. Three, all manual adjustments to clock rings in TACS are flagged and can easily be traced for justification as needed.